

1 (Counsel for the parties listed on next page)
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
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11 THOMAS DALTON,

12 Plaintiff,

13 vs.

14 UNITED PARCEL SERVICE, an Ohio
15 Corporation; AMERICAN SUBSTANCE
16 ABUSE PROFESSIONALS, INC., a Maryland
17 Corporation; JERRY MATTES, an individual;
18 MARY SUE ALLEN, an individual; HAIDEE
19 LAGUNDAY, an individual; and DOES 1
20 through 50, inclusive,

21 Defendants.
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No. C 10-05305 PJH

**STIPULATION AND [PROPOSED]
ORDER TO RESCHEDULE CASE
MANAGEMENT CONFERENCE**

STIPULATION AND [PROPOSED] ORDER TO
RESCHEDULE CASE MANAGEMENT
CONFERENCE
CASE NO. C 10-05305 PJH

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15 MARY SUB ALLEN, and HAIDEE LAGUNDAY

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Attorneys for Plaintiff
THOMAS DALTON

STIPULATION AND [PROPOSED] ORDER TO
RESCHEDULE CASE MANAGEMENT
CONFERENCE
CASE NO. C 10-05305 PJH

1 The parties, by their undersigned counsel, hereby stipulate to the following:

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3 WHEREAS the case management conference is currently scheduled for March 10,
4 2011;

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6 WHEREAS lead counsel for Plaintiff attended the parties' in-person Rule 26(f)
7 meeting on February 15, 2011;

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9 WHEREAS lead counsel for Plaintiff has had a family emergency and is
10 unavailable to review the parties' joint case management report and may be unavailable to attend
11 the March 10, 2011 case management conference;

12
13 WHEREAS the parties agree that good cause exists for rescheduling the case
14 management conference and that doing so will further the interests of judicial efficiency and
15 conserve resources;

16
17 WHEREAS a representative of Plaintiff's counsel's called the Court's Clerk on
18 March 3, 2011 to advise about Plaintiff's counsel's family emergency; and

19
20 WHEREAS Plaintiff's counsel's representative was informed that the Court holds
21 case management conferences on Thursdays, and the parties have proposed the first Thursday on
22 which counsel for all parties are available;

23
24 IT IS HEREBY STIPULATED by and between the parties hereto that the case
25 management conference shall be rescheduled to April 21, 2011 at 2:00 p.m. in Courtroom 3, 3rd
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STIPULATION AND [PROPOSED] ORDER TO
RESCHEDULE CASE MANAGEMENT
CONFERENCE
CASE NO. C 10-05305 PJH

1 Floor, Federal Building, 1301 Clay Street, Oakland, California.

2 DATED: March 3, 2011

3 E. JEFFREY GRUBE
4 GINA GUARENTI COOK
5 BRITTANY F. STEVENS
6 PAUL, HASTINGS, JANOFSKY & WALKER LLP

7 By: *Gina Guarienti Cook*
8 GINA GUARENTI COOK

9 Attorneys for Defendants
10 UNITED PARCEL SERVICE, INC., JERRY MATTES,
11 MARY SUE ALLEN, AND HAIDEE LAGUNDAY

12 DATED: March 3, 2011

13 BALDWIN LEE
14 ANNETTE M. RITTMULLER
15 ALLEN MATKINS LECK GAMBLE MALLORY &
16 NATSIS LLP

17 By: *Annette Rittmuller*
18 ANNETTE M. RITTMULLER

19 Attorneys for Defendant
20 AMERICAN SUBSTANCE ABUSE
21 PROFESSIONALS, INC.

22 DATED: March 3, 2011

23 TROY A. VALDEZ
24 MARVIN DUNSON III
25 ERIN M. DOYLE
26 VALDEZ DUNSON & DOYLE LLP

27 By: *Marvin Dunson III*
28 MARVIN DUNSON III

Attorneys for Plaintiff
THOMAS DALTON

IT IS SO ORDERED.

DATED: March 7, 2011.

THE HONORABLE PHYLIS J. HAMILTON

